

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

March 5, 2024

The Honorable Sarah Netburn  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

The Plaintiffs Executive Committees ("PECs"), on behalf of Plaintiffs with claims against defendant Al Rajhi Bank ("ARB"), write to respectfully request the Court's authorization to file voluminous documentary materials and evidence offered in support of Plaintiffs' jurisdictional averment with the Clerk of the Court's Office under seal via a CD or DVD. Plaintiffs' jurisdictional averment is due this Friday, March 8, 2024. *See* ECF No. 9596.

This Court has previously authorized Plaintiffs in this MDL litigation to file voluminous evidentiary records in digital format with the Clerk of the Court. *See* Orders at ECF Nos. 2929, 3773, and 9479. The Clerk's Office has informed us that they will only accept documents on CD or DVD, and further advised that a specific order from Your Honor is required to file in this manner again on March 8, 2024. Plaintiffs do not want to risk overburdening the Court's Electronic Case Filing ("ECF") system with potentially thousands of pages of exhibits, concerns previously raised by the Court's ECF officer, and thus respectfully request the Court's endorsement of this proposal. These materials will be served on counsel for ARB via secure file transfer on March 8, 2024.

Plaintiffs thank the Court for its attention to this request.

Respectfully submitted,

COZEN O'CONNOR

By: /s/ Sean P. Carter

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*On behalf of the Plaintiffs' Executive  
Committees*

Honorable Sarah Netburn

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cc: All MDL Counsel of Record

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